

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

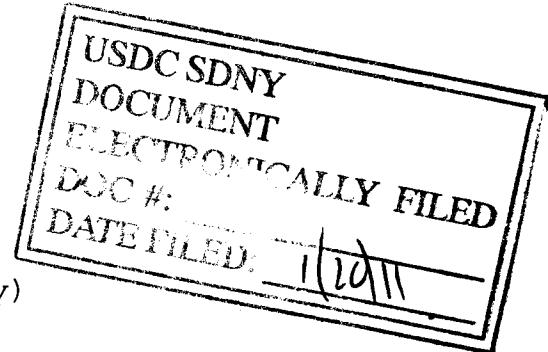
UNITED STATES OF AMERICA  
- v. -  
JAIRO DE JESUS RENDON-HERRERA,  
a/k/a "J,"  
Defendant.

## **SUPERSEDING INFORMATION**

S4 04 Cr. 962 (LAP)

## COUNT ONE

(Money Laundering Conspiracy)



The United States Attorney charges:

1. In or about the late 1990s, in the Southern District of New York and elsewhere, JAIRO DE JESUS RENDON-HERRERA, a/k/a "J," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 1956(a) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that JAIRO DE JESUS RENDON-HERRERA, a/k/a "J," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer of hundreds of thousands of dollars in cash, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the

proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions, knowing that the transactions were designed in whole and in part to conceal the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACT

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about the late 1990s, a co-conspirator not identified as a defendant herein informed JAIRO DE JESUS RENDON-HERRERA, a/k/a "J," the defendant, that narcotics proceeds owed to RENDON-HERRERA had been picked up in New York.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION AS TO COUNT ONE

4. As a result of committing the money-laundering offense alleged in Count One of this Information, defendant JAIRO DE JESUS RENDON-HERRERA, a/k/a "J," shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property, including, but not limited to, a sum of money equal to at least \$9.6 million in United States currency, representing the amount

of property involved in the money laundering offense and traceable to the money laundering offense.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)

Preet Bharara  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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- V -

JAIRO DE JESUS RENDON-HERRERA,

Defendant.

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INFORMATION

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(18 U.S.C. § 1956(a)(1)(B)(i), (h))

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PREET BHARARA  
United States Attorney.

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